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Ex. 6 - Personal Privacy

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Those of us who live near the San Pedro river riparian corridor are very interested in maintaining the water flow and riparian habitat along the river. New residential developments must not be allowed if they impact the river in any way.

The Clean Water Act Section 404 Permit issued to Whetstone Ranch by the Army Corps of Engineers in 2006 (Permit #2003-00826-SDM) does not apply to the proposed Villages at Vigneto development since they are quite different in scope. A new ACE Permit should be prepared for Vigneto, and new scientific information on the connection between surface and groundwater that has become available since 2006 must be evaluated.

I believe the Villages at Vigneto development poses a potential threat to an EPA-designated Aquatic Resource of National Importance (ARNI), two Global Important Bird Areas on the San Pedro River, and the BLM-managed San Pedro Riparian National Conservation Area, including the St. David Cienega. Numerous riparian mitigation properties located downstream from Vigneto along the San Pedro River may also be impacted, as well as the cave system at Kartchner Caverns State Park. The sustainability of these vital conservation areas and tourist destinations rely upon having sufficient water quantity and quality.

Significant information related to wildlife dispersal corridors and habitat connectivity along the San Pedro river have been developed in the last few years. These data were not adequately considered in the analysis for the 2006 Whetstone Ranch Section 404 Permit. The southern half of Vigneto is located in Arizona Wildlife Linkage Zone #97, identified in the Arizona Department of Transportation (ADOT) and Arizona Game and Fish

Department's (AZGFD) 2006 Arizona Wildlife Linkages Assessment.

Before any further development is considered, Part Three of the three-part hydrologic study by the USGS that models water movement along the San Pedro River basin should be funded, completed and fully considered. That includes the Vigneto development and any others. Part Two of the study, which describes the Middle San Pedro Watershed, was recently released and should be fully considered as well.

The amount of water Vigneto would pump from the shallow aquifer is estimated to be approximately 10,000 acre-feet of water per year. By comparison, in 2013 the City of Benson only pumped 833 acre-feet of water. The combined impacts of dramatically increased ground water pumping, on-going drought, and predicted climate change-induced mega-droughts should be considered carefully by the ACE, EPA, USFWS and the Benson City Council before committing any water to Vigneto.

Thank you for the opportunity to comment.

Robert J. Luce

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